BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

POSTAL RATE AND FEE CHANGES, 2001	Docket No. R2001–1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS–T39–13-14)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatories of Office of the Consumer Advocate:

OCA/USPS–T39–13-14, filed on November 28, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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December 12, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T39-13 Please refer to the response to OCA/USPS-145.

a. Refer to the response to part a., where it states that "First-Class sort plans likely involve the use of more stackers." Please explain how the "use of more stackers" for automation compatible, barcoded First-Class Mail letter-shaped pieces weighing one ounce as compared to automation compatible, barcoded Standard Mail letter-shaped pieces weighing one ounce affects throughput and productivity for First-Class and Standard Mail letter-shaped pieces.

b. Refer to the response to part a., where it states that "First-Class and Standard Mail are sometimes processed on different sort plans" (emphasis added). Please assume First-Class and Standard Mail are processed on the same sort plans.

   i. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce would have the same throughput and productivity when processed on the Delivery Bar Code Sorter (DBCS), Mail Processing Bar Code Sorter (MPBCS), and Carrier Sequence Bar Code Sorter (CSBCS). If you do not confirm, please explain.

   ii. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces that weigh two and three ounces would have the same throughput and productivity when processed on the DBCS, MPBCS, and CSBCS. If you do not confirm, please explain.

c. Refer to the response to part a., where it states that "First-Class and Standard Mail are sometimes processed on different sort plans" (emphasis added). Please assume First-Class and Standard Mail are processed on the same sort plans. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces of the same thickness would have the same throughput and productivity when processed on the DBCS, MPBCS, and CSBCS. If you do not confirm, please explain.

d. Refer to the response to part a., where it states that "First-Class and Standard Mail are sometimes processed on different sort plans" (emphasis added). Please assume First-Class and Standard Mail are processed on the same sort plans. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces of the same length would have the same throughput and productivity when processed on the DBCS, MPBCS, and CSBCS. If you do not confirm, please explain.

e. Refer to the response to part b., where it states "These differences would likely impact productivity."

   i. Please define the term "productivity' as used in the response.

ii. Please provide a numeric example showing the calculation of productivity. If there are alternative calculations for productivity, please show these alternative calculations.

iii. Please identify the calculation of productivity from subpart ii. used, or used predominately, by the Postal Service.

iv. Does the calculation of productivity differ based upon the type of automated mail processing equipment? If yes, show the calculation of productivity for each type of automated mail processing equipment.

f. Refer to the response to part h., where reference is made to "mail pieces that are rejected on the first pass." To what extent are automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce "rejected on the first pass" on the DBCS, MPBCS, and CSBCS? Please provide the frequency, or an estimate of the frequency, with which ihis occurs for DBCS, MPBCS, and CSBCS processing.

g. Refer to the response to part h., where reference is made to "mail pieces that are rejected on the first pass." To what extent are First-Class automation compatible, barcoded letter-shaped pieces weighing one ounce "rejected on the first pass" as compared to automation compatible, barcoded Standard Mail letter-shaped pieces weighing one ounce? Please provide the frequency, or an estimate of the frequency, with which this occurs for DBCS, MPBCS, and CSBCS processing.

h. Refer to the response to part h., where reference is made to "mail pieces that are rejected on the first pass." To the extent there are different reject rates on the first pass for automation compatible, barcoded First-Class letter-shaped pieces weighing one ounce vs. automation compatible, barcoded Standard Mail letter-shaped pieces weighing one ounce, would the different reject rates produce a small or large impact on the throughput and productivity of such letter-shaped pieces on the DBCS, MPBCS, and CSBCS? Please explain and provide copies of any studies, reports, other documents, or communications that support the explanation.

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RESPONSE:

a. I would not expect an impact on throughput with the use of more stackers, however, productivity could be affected. A change in the number of stackers implies a change in the pattern and quantity of stackers filling up and requiring sweeping, labeling, and removal of full trays.

b. – d. Not confirmed given the different physical characteristics between the two classes of letters. Theoretically, *if* everything about the two sets were constant, the throughput and productivity would be similar. See response to OCA/USPS-T39-1d.

e. i. See footnote 7 on page 4 of my testimony (USPS-T39) for a definition of productivity. ii. & iii. If 120,000 pieces were *finalized* on a single machine and it took ten workhours, including scheme setup, run time, break time, and sweeping, productivity would be 12,000 pieces per workhour. iv. No.

f. See USPS-LR-J-60, page 51.

g. Machine processing statistics are not tracked by class or weight. See response to OCA/USPS-40.

h. Based on my personal experience, to the extent there are different reject rates I would expect a small impact. I am not aware of any documents or studies addressing this topic.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T39-14 Please refer to the response to OCA/USPS-168.

a. Refer to the response to part a., which references OCA/USPS-145(a) where it states that "First-Class sort plans likely involve the use of more stackers," Please explain how the "use of more stackers" for automation compatible, barcoded First-Class Mail flat-shaped pieces weighing two ounces as compared to automation compatible, barcoded Standard Mail flat-shaped pieces weighing two ounces affects throughput and productivity for First-Class and Standard Mail flat-shaped pieces.

b. Refer to the response to part a., which references OCA/USPS-145(a) where it states that "First-Class and Standard Mail are sometimes processed on different sort plans" (emphasis added). Please assume First-Class and Standard Mail are processed on the same sort plans.

   i. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces weighing two ounces would have the same throughput and productivity when processed on the Advanced Flat Sorting Machine
   (AFSM) 100, the Flat Sorting Machine (FSM) 881, and the Flat Sorting Machine (FSM) 1000. If you do not confirm, please explain.

   ii. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces that weigh three and four ounces would have the same throughput and productivity when processed on the AFSM 100, FSM 881, and FSM
   1000. If you do not confirm, please explain.

c. Refer to the response to part a., which references OCA/USPS-145(a) where it states that "First-Class and Standard Mail are sometimes processed on different sort plans" (emphasis added). Please assume First-Class and Standard Mail are processed on the same sort plans. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces of the same thickness would have the same throughput and productivity when processed on the AFSM 100, FSM 881, and FSM 1000. If you do not confirm, please explain.

d. Refer to the response to part a., which references OCA/USPS-145(a) where it states that "First-Class and Standard Mail are sometimes processed on different sort plans" (emphasis added). Please assume First-Class and Standard Mail are processed on the same sort plans. Holding all other factors constant, please confirm that automation compatible, barcoded First-Class Mail and Standard Mail flat-shaped pieces of the same length would have the same throughput and productivity when processed on the AFSM 100, FSM 881, and FSM 1000. If you do not confirm, please explain.

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RESPONSE:

a. See response to OCA/USPS-T39-13a.

b. – d. See response to OCA/USPS-T39-13b-d.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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Joseph K. Moore

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